

EXHIBIT A
PROPOSED ORDER

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**[PROPOSED] ORDER GRANTING
SECURITIES LEAD PLAINTIFF'S MOTION
TO APPLY BANKRUPTCY RULE 7023 TO
CLASS PROOF OF CLAIM**

1 Upon the Motion, dated December 9, 2019 [ECF No.]¹, of Public Employees
2 Retirement Association of New Mexico (“**Lead Plaintiff**” or “**PERA**”), the court-appointed lead
3 plaintiff in the securities class action captioned as *In re PG&E Corporation Securities Litigation*,
4 Case No. 18-03509 (the “**Securities Litigation**”) pending in the U.S. District Court for the
5 Northern District of California (the “**District Court**”) on behalf of itself and the proposed class it
6 represents in the Securities Litigation (the “**Class**”), together with York County on behalf of the
7 County of York Retirement Fund, City of Warren Police and Fire Retirement System, and Mid-
8 Jersey Trucking Industry & Local No. 701 Pension Fund (collectively, the “**Securities Act**
9 **Plaintiffs**” and together with Lead Plaintiff, the “**Securities Plaintiffs**”), for entry of an order,
10 pursuant to Rules 9014(a) and (c) of the Federal Rules of Bankruptcy Procedure (the
11 “**Bankruptcy Rules**”), directing that Bankruptcy Rule 7023 applies to the class proofs of claim
12 filed by Lead Plaintiff on behalf of itself and the Class against each of the Debtors (the “**Class**
13 **Claims**”) [Claim Nos. 72193, 72273] and establishing a briefing schedule for and scheduling a
14 hearing, if necessary, on certification of the Class for all purposes in the chapter 11 bankruptcy
15 cases (the “**Chapter 11 Cases**”) of the above-captioned debtors in possession (the “**Debtors**”);
16 and this Court having jurisdiction to consider the Motion and the relief requested therein
17 pursuant to 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy Cases and Proceedings
18 to Bankruptcy Judges, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a); and
19 consideration of the Motion and the requested relief being a core proceeding pursuant to 28
20 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and
21 1409; and this Court having found and determined that notice of the Motion was reasonable and
22 sufficient, and it appearing that no other or further notice need be provided; and this Court
23 having reviewed the Motion and held a hearing to consider the Motion; and this Court having
24 determined that the legal and factual bases set forth in the Motion establish just cause for the
25 relief granted herein; and it appearing that the relief requested in the Motion is appropriate under
26 the circumstances; and upon the record of all of the proceedings had on the Motion before this
27 Court, and after due deliberation and sufficient cause appearing therefor,

28 ¹ Capitalized terms used but not defined herein have the meanings given thereto in the Motion.

1 **IT IS HEREBY ORDERED THAT:**

2 1. The Motion is granted as set forth herein.

3 2. Pursuant to Federal Rule of Bankruptcy Procedure 9014, the Court hereby directs
4 that Federal Rule of Bankruptcy Procedure 7023 applies to the Motion and the Class Claim.

5 3. Lead Plaintiff shall file its brief in support of certification of the Class for purposes
6 of the Chapter 11 Cases on or before _____, 2020. The Debtors shall file their
7 brief, if any, in opposition to certification of the Class for purposes of the Chapter 11 Cases on or
8 before _____, 2020. Lead Plaintiff shall file its reply brief, if any, in further
9 support of certification of the Class for purposes of the Chapter 11 Cases on or before
10 _____, 2020.

11 4. Nothing in this Order shall preclude Lead Plaintiff from seeking withdrawal of the
12 bankruptcy reference with respect to certification of the Class for purposes of the Chapter 11
13 Cases.

14 **** END OF ORDER ****